

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ZENIMAX MEDIA INC. and  
ID SOFTWARE LLC,

Plaintiffs,

V.

OCULUS VR, LLC,  
PALMER LUCKEY,  
and FACEBOOK, INC.

Defendants.

**CIVIL CASE NO. 3:14-cv-01849-P**

**PLAINTIFFS' APPENDIX TO THEIR OPPOSITION TO  
DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

<u>DOCUMENT</u>	<u>EXHIBIT</u>	<u>PAGE(S)</u>
Letter from K. Hemr to Defendants' Counsel regarding depositions and other issues (dated July 8, 2015)	1	1-5
Email correspondence between Counsel regarding depositions with calendar and deposition notices (dated October 14, 2015)	2	6-47
Email correspondence between Counsel regarding depositions (dated October 27, 2015) (highlighted)	3	48-55
Email from P. Anthony Sammi to Defendants' Counsel regarding Mr. Iribe's availability for deposition (dated November 4, 2015)	4	56-59
Steven Tweedie, <i>Oculus CEO Reveals How He Convinced Mark Zuckerberg to Try the Rift</i> , Business Insider (dated December 30, 2014)	5	60-63
Shayndi Raice et al., <i>In Facebook Deal Board Was All But Out of the Picture</i> , Wall Street Journal (dated April 18, 2012)	6	64-70
Facebook, Inc., 2015 Form 10-K (highlighted and excerpted)	7	71-74

Dated: November 5, 2015

P. ANTHONY SAMMI  
E-mail: Anthony.Sammi@skadden.com  
KURT WM. HEMR  
E-mail: Kurt.Hemr@skadden.com  
JAMES Y. PAK  
Texas State Bar No. 24086376  
E-mail: James.Pak@skadden.com  
KRISTEN VOORHEES  
E-mail: Kristen.Voorhees@skadden.com  
DEVIN A. KOTHARI  
E-mail: Devin.Kothari@skadden.com  
(the foregoing attorneys admitted *pro hac vice*)  
**SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP**  
Four Times Square  
New York, New York 10036  
Telephone No.: 212-735-3000  
Facsimile No.: 212-735-2000

Respectfully submitted,

s/ Phillip B. Philbin  
PHILLIP B. PHILBIN  
Texas State Bar No. 15909020  
E-mail: phillip.philbin@haynesboone.com  
MICHAEL D. KARSON  
Texas State Bar No. 24090198  
E-mail: michael.karson@haynesboone.com  
**HAYNES AND BOONE LLP**  
2323 Victory Avenue, Suite 700  
Dallas, Texas 75219  
Telephone No.: 214-651-5000  
Facsimile No.: 214-651-5940

*Attorneys for Plaintiffs*  
*ZeniMax Media Inc. and id Software LLC*

**CERTIFICATE OF SERVICE**

On November 5, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: November 5, 2015

*s/ Phillip B. Philbin*

Phillip B. Philbin